

Statement of Facts

The State and the Defendant understand, agree, and stipulate to the following Statement of Facts, which the State would prove beyond a reasonable doubt had this case proceeded to trial:

On or about May 14, 2021, law enforcement was contacted by a female complainant, Victim 1, who advised that she discovered nude photographs of herself posted to the public website REDDIT.com ("REDDIT"). Victim 1 informed law enforcement that the photographs were posted without her knowledge, permission, or consent. Victim 1 discovered the photographs while she was outside of the state of Maryland. Victim 1 informed law enforcement that she had taken and sent the photographs to only one person, the Defendant Andrew Bradshaw. Victim 1 advised law enforcement that the photographs were transmitted to the Defendant during a romantic relationship years ago.

Lawful investigative actions by members of law enforcement resulted in the seizure of various records and documents from electronic service providers and internet service providers. These records included information from Comcast indicating that the IP address utilized to post Victim 1's nude photographs on REDDIT resolved to the Defendant's residence in Cambridge, MD, which is located in Dorchester County, MD. Additional records seized pursuant to lawful investigative actions also demonstrated Defendant's control over several REDDIT, Google, and Snapchat accounts created and utilized by Defendant. The investigation by law enforcement revealed the Defendant made numerous separate posts that contained at least 10 unique visual representations of Victim 1, with Victim 1's intimate parts exposed and that numerous public REDDIT posts contained language that was related to humiliation and degradation.

Investigation revealed that on April 12, 2021, the Defendant posted a photograph of Victim 1 in the NeedySluts subReddit with the caption, "Tell me how you'd use me;)". Investigation revealed that on April 12, 2021, the Defendant posted a photograph of Victim 1 in the Slut subReddit with the caption, "Tell me how you'd use me ;)". Investigation revealed that on April 4, 2021, the Defendant posted a photograph of Victim 1 in the Slut subReddit with the caption, "He is risen, but I'd like to make something rise In your pants ;)". Investigation revealed that on April 4, 2021, the Defendant posted a photograph of Victim 1 in the DadWouldBeProud subReddit with the caption, "He is risen, but I'd like to make something rise In your pants ;)". Investigation revealed that on April 15, 2021, the Defendant posted a photograph of Victim 1 in the Chubby subReddit with the caption, "Ready to ride you".

If called to testify, Victim 1 would testify that she did not give the Defendant her consent to the distribution of her images and that she had a reasonable expectation that the images would remain private.

A search warrant was executed at the Defendant's residence and electronic devices belonging to the Defendant were seized. Subsequent forensic examination of a computer seized from the Defendant's residence revealed the same visual representations of Victim 1 that were posted to REDDIT and additional evidence corroborating the Defendant's use and control of the aforementioned REDDIT accounts. During the execution of the search warrant, the Defendant

was interviewed by law enforcement after having been advised of his Miranda rights. The Defendant admitted to creating REDDIT accounts and posting Victim 1's nude photographs on public internet forums.

As a result of the forgoing, the State respectfully submits that the Defendant did knowingly distribute a visual representation of another identifiable person, Victim 1, that displays Victim 1 with her intimate parts exposed. Witnesses would identify the Defendant as the individual who distributed those photographs. All events occurred in Dorchester County, Maryland.